

March 7, 2005

Electronically Filed

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **In the Matter of Implementation of Section 304 of the
Telecommunications Act of 1996 (Commercial Availability of
Navigation Devices), CS Dkt. No. 97-80**

Dear Ms. Dortch:

Dell Inc. ("Dell"), Intel Corporation ("Intel") and Hewlett Packard Company ("HP") would like to reiterate our respective support for maintaining the July 1, 2006 "reliance date" for CableCARD compatibility, and submit that the Commission's retention of that date by which cable operators will no longer be permitted to sell or lease integrated cable set-top boxes is of critical importance to advance a competitive retail market for navigation devices. We have outlined our respective views in detail in recent filings with the Commission on this topic. Although we read with interest the recent filing by Comcast, Time Warner and Microsoft, our views with respect to the integration ban have not changed.

With respect to advancing the digital television transition and speeding the development of a competitive retail market for navigation devices, Dell, Intel and HP support efforts that will (i) lead to multi-stream CableCARD availability for unidirectional digital cable devices on an expedited basis with clear public commitments to rapid deployment and availability for all DFast Licensees in early '06, and (ii) speed the creation of a competitive retail market for interactive digital cable devices. We are also interested in exploring the availability of an acceptable downloadable security solution in time that advances a competitive retail market for interactive digital cable devices (which we believe is permitted under current FCC regulations), but we do not support delaying the roll-out of interactive cable devices during that exploration. To date, we do not see any material changes in the environment that lead us to believe that the challenges associated with these issues have changed, that such commitments are forthcoming, that the existing process will be improved to the stated goal, or that delaying the reliance date will in any way advance these issues. To the contrary, we believe that delaying the reliance

Marlene H. Dortch, Esq.
November 12, 2004
Page 2 of 3

date will only delay the time in which these issues will be addressed because it in fact delays the very need to address these issues. In this context, as set forth in our previous filings, we believe that maintaining the reliance date is the best way to provide the incentives necessary to advance interactive cable television and these goals, but we welcome new opportunities to accelerate the deployment of multi-stream CableCARDS for unidirectional devices and speed the development of a competitive retail market for interactive navigation devices. To that end, we note that Direct FCC oversight of the existing process (and any changed process) would be helpful.

Very truly yours,

/s/
Neeraj Srivastava
Director
Client Architecture & Technology
Dell Inc.

/s/
Dan Orr
Director
Strategic Business Development
Office of Corporate Strategy and Technology
Hewlett Packard Company

/s/
Jeffrey T. Lawrence
Director
Content Policy
Intel Corporation

Cc: Via Email

Chairman Michael Powell
Commissioner Kathleen Abernathy
Commissioner Jonathan Adelstein
Commissioner Michael Copps
Commissioner Kevin Martin
Mr. Kenneth Ferree
Mr. Rick Chessen

Marlene H. Dortch, Esq.
November 12, 2004
Page 3 of 3

Ms. Susan Mort
Ms. Johanna Shelton
Ms. Stacy Robinson Fuller
Mr. Catherine Bohigian
Mr. Jordan Goldstein
Mr. Jon Cody